

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America

v.

RODRIGUEZ, Raul

Case No.

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 09-02-2017 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

21 USC 841 (A)(1), &amp; 846

*Offense Description*

The defendant did knowingly and unlawfully possess with intent to distribute a controlled substance listed under Schedule I, Title II of the Controlled Substances Act, to wit; approximately 11.5 kg of cocaine.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.*Complainant's signature*

Dale Delaney, Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 09/05/2017*Judge's signature*City and state: Laredo, Texas*Printed name and title*

On September 2, 2017, at approximately 1:50 PM, United States Border Patrol (USBP) Agents were conducting routine checks at the Border Patrol North Checkpoint in Laredo, Texas when a white 2005 Chevrolet Silverado bearing Mexican license plates RD-51-330 approached the primary inspection lane. USBP Agents conducted an immigration inspection of the driver, later identified as Raul RODRIGUEZ. During the immigration inspection, a USBP canine alerted to the presence of concealed humans and/or the odors of a controlled substance. RODRIGUEZ was then instructed to proceed to the secondary inspection area for further inspection.

On the same date, the Chevrolet Silverado was placed on a car lift for further inspection. On the lift, USBP Agents observed aftermarket sheet metal covered with fresh black bondo on the undercarriage of the vehicle. A power drill was utilized to drill through the bondo, revealing a white powdered substance. A small amount of the white powder was field tested utilizing the Gemini Spectrometer, which resulted in a positive match for characteristics of cocaine. Upon further inspection of the interior of the vehicle, a trap door was discovered underneath the center console of the vehicle. Upon opening the trap door, ten bundles wrapped in black cellophane were located inside the compartment.

Agents with the United States Drug Enforcement Administration (DEA) were contacted later in the afternoon regarding the seizure of cocaine and the arrest of one subject.

At approximately 7:00 PM, DEA Agents responded to the USBP North Checkpoint in Laredo, Texas to interview the one subject who was detained regarding the above referenced incident. The subject was identified as Raul RODRIGUEZ. Per records checks conducted by USBP Agents, RODRIGUEZ is a United States citizen.

Prior to questioning RODRIGUEZ about his involvement regarding the above referenced incident, Agents conducted a routine Personal History Report that is used to gather personal

identification information. RODRIGUEZ was advised of his Miranda Rights in Spanish and waived his rights. During his subsequent interview, RODRIGUEZ stated that he purchased the Silverado from Edgar LNU in Monterrey, Mexico in July 2017. RODRIGUEZ also initially stated that the vehicle was registered in his (RODRIGUEZ) name, but later stated the vehicle remained in Edgar LNU's name, as RODRIGUEZ was unable to register the vehicle.

RODRIGUEZ claimed to be unaware of the cocaine contained within a concealed compartment within the vehicle. RODRIGUEZ further stated though he had possession of the vehicle since July 2017, he did not drive the vehicle into the United States until that day, September 2, 2017.

Law enforcement indices indicate the Chevrolet Silverado entered Mexico from the United States from the Juarez-Lincoln International Bridge on August 6, 2017, and returned to the United States from the Juarez-Lincoln International Bridge on September 2, 2017.

DEA Agents then transported RODRIGUEZ to Webb County Jail in Laredo, Texas where he will be held pending an initial court appearance.